



October 4, 2011

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, DC 20554

Re: *Telecommunications Relay Service ("TRS") and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities, CG Docket No. 10-51 (Via ECFS)*

Dear Ms. Dortch:

Pursuant to 47 C.F.R. §64.606 of the Federal Communications Commission ("Commission") rules, Snap Telecommunications, Inc. ("Snap!VRS") hereby notifies the Commission of its intent to apply for Internet-based TRS provider and TRS program recertification and requests clarification on the deadline for certification submission given the specific Public Notice and Order referenced below.

On May 6, 2011, the Commission released a Public Notice¹ that temporarily extended, until November 4, 2011, the certification period for providers of Video Relay Service (VRS) and IP Relay Service holding current certifications scheduled to expire on or before that date. This extension was intended to eliminate the immediate need for the Commission to renew certifications under the current rules while it considers reform of the certification process in the VRS Fraud Order and FNPRM. At the same time, this Public Notice enables providers with expiring certifications to continue to seek compensation from the Interstate TRS Fund for a limited period, pending the Commission's consideration of new requirements. Under this Public Notice, certification submissions would be due by October 5th, that is, 30 days prior to the November 4th expiration date.

On July 28, 2011, however, the Commission adopted rule revisions in regard to VRS certification requirements in the *iTRS Certification Order*.² By that Order, the Commission revised its requirements and procedures by which entities may become certified VRS providers. The rules adopted in the *iTRS Certification Order* became effective on September 6, 2011, with the exception of those containing information collection, which requires approval by the Office of Management and Budget (OMB) under the Paperwork Reduction Act (PRA) to become effective; the Commission's request for such approval is pending before OMB. The Commission's Order Extending Suspension of Effective Date,³ released on September 30, 2011, reinforced the fact that OMB approval remains in a pending status. In essence, the Commission agreed it could not require submission of and act on applications for certification until the information collection requirements adopted in the *iTRS Certification Order* have become effective.

Again, Snap!VRS reiterates its intent to apply to the Commission for Internet-based TRS provider and TRS program recertification and seeks clarification from the Commission on the deadline for certification submission. If there are any questions regarding the above, please do not hesitate to contact me.

Sincerely,

/s/

Nancy J. Bloch
Chief Regulatory Liaison and Advisor
443-438-1328 V/VP

¹ *Consumer and Governmental Affairs Bureau Announce Extension of Expiring Certifications for Providers of Internet-Based Telecommunications Relay Services* (Public Notice), CG Docket Nos. 03-123 and 10-51, released May 6, 2011.

² *Structure and Practices of the Video Relay Service Program*, Second Report and Order and Order (*iTRS Certification Order*), CG Docket No. 10-51, released July 28, 2011.

³ *Structure and Practices of the Video Relay Service Program*, Order Extending Suspension of Effective Date, CG Docket No. 10-51, released September 30, 2011.



nbloch@snapvrs.com